

## **CENTUM FINANCIAL GROUP INC. PRIVACY POLICY**

Centum Financial Group Inc. (“CENTUM”) recognizes the importance of protecting the personal information of our Customers, our prospective customers, brokers and sales people with our franchisees and anyone else from whom we may collect personal information from time to time whether in the course of real estate transactions or otherwise.

This Privacy Policy discloses the type of personal information we gather from or about you (“You”), how we may use it, how and to whom we may disclose it, your right to access your personal information which we have collected and your right to correct or change that information where You believe it may be inaccurate. At CENTUM we hope to give You as much control about your personal information as possible.

### **CENTUM and its Franchisees**

As a franchisor, CENTUM does not provide mortgage broker services. Mortgage broker services are provided exclusively by CENTUM franchisees (“Franchisees”). Each Franchisee is an independently owned and operated mortgage broker business. While CENTUM has undertaken extensive measures to control and ensure the privacy and security of personal information collected by it, it does not own or control the operations of its Franchisees. Customers and prospective customers who have concerns about the treatment of their personal information by a Franchisee with which they are dealing are urged to contact that Franchisee directly. This Privacy Policy addresses personal information that CENTUM has in its possession or control

### **What We Mean By Personal Information?**

Personal information is any information in whatever form about an identifiable individual. However, it does not include:

1. your name or information which would enable us to contact You at your place of employment including your name, position name or title, business telephone number, business address, business email and business fax number;
2. personal information about You that is publicly available information such as information available from a public registry or contained in a telephone book;
3. aggregated information that cannot be associated with You as a specific individual; and
4. information which is not about a person but which is about a company, association or another organization.

### **What Personal Information Does CENTUM Collect?**

CENTUM collects the following personal information:

1. personal information which You voluntarily provide to us when You visit a CENTUM Franchisee or that is otherwise provided to CENTUM, such as by telephone, email, mail

or fax; and

2. personal information which You voluntarily provide to us when You visit our website (the “**Website**”), such as when You complete a contact request, and personal information relating to your use of the Website (in accordance with our more detailed Website Privacy Policy set out below).

Except where permitted by law, CENTUM collects, uses and discloses your personal information with your knowledge and consent and we will do so fairly and openly.

### **How We Use Your Personal Information**

CENTUM uses personal information for the following purposes:

1. to put You in touch with a broker or sales person with one of our Franchisees who may contact You to assist You with finding a mortgage;
2. to assist the broker or sales person in finding an appropriate mortgage for You; and
3. for the purposes relating to use of personal information collected on the Website set out below in our Website Privacy Policy.

### **Why We Disclose Your Personal Information**

1. CENTUM may share personal information with third parties engaged to assist us in providing services or products to You or to carry out one or more of the purposes described above. These service providers are prohibited from using personal information for any purpose other than to provide this assistance and are required to protect personal information disclosed to them by us and to comply with the general privacy principles described in this Privacy Policy. Note that CENTUM retains a U.S. located service provider (including, for example, WhereToLive.com, Inc.) for certain services and the personal information provided to that U.S. based provider is subject to the laws of the jurisdiction in which it operates.
2. CENTUM discloses personal information when it makes the personal information a person has provided online available to its Franchisees and their brokers and sales people.
3. CENTUM may disclose personal information gathered on the Website for the purposes set out below in our Website Privacy Policy.

CENTUM reserves the right to collect, use and disclose other personal information without your knowledge or consent if we are required to do so or if we are allowed to by law.

### **Consent**

Except where required or permitted to do so without your consent, CENTUM only collects your personal information with your consent. In most cases, CENTUM relies on express consent. However, where the purpose of the collection of personal information is obvious on its face,

CENTUM may rely on your implied or deemed consent.

In some cases, such as using your personal information for marketing services to You, CENTUM will rely on opt-out consent. (You will receive the information unless You advise us You do not wish to receive it.)

CENTUM only collects personal information where it is reasonably necessary to provide the service which You are seeking and which we have agreed to provide. We do not use deceptive or misleading practices to obtain your consent.

CENTUM does not require You to consent to the collection, use or disclosure of personal information as a condition of the supply of a service by us unless such collection, use or disclosure is required to fulfill the aforementioned purposes of collection.

CENTUM reserves the right to collect, use or disclose personal information in certain limited circumstances, without your knowledge and consent, where required or permitted by law.

You may withdraw your consent to the collection, use and disclosure of personal information in connection with the services that You have requested from us at any time, subject to legal or contractual restrictions and reasonable notice. CENTUM will inform You of the implications of withdrawing your consent. If You wish to withdraw your consent at any time, please contact CENTUM's Privacy Officer (see below for contact information).

### **Access To Your Personal Information**

You have the right to access your personal information in the possession or control of CENTUM and to know how that personal information has been and is being used, and to whom it has been disclosed. CENTUM reserves the right to refuse to comply with all or part of a request where we are required to or are permitted to refuse to do so by the provisions of applicable personal information protection legislation.

Applications must be in writing and be sent to our Privacy Officer either by mail or email at the addresses set out below. Applications should have sufficient detail that allows us to identify You and the personal information You are requesting.

You may ask to have errors or omissions in your personal information in our possession or control corrected. If we are satisfied that the correction is reasonably necessary, we will correct the personal information and notify anyone to whom we have provided the personal information in the previous 12 months of the correction. If we are not satisfied that the correction should be made, we will annotate the personal information under our control of the correction requested but not made.

Requests for access and correction will usually be responded to within 30 calendar days of receiving the request unless we apply to the applicable Privacy Commissioner for an extension. We charge \$25 plus \$.25 per page for providing You with copies of your personal information. In the event that it will take an unusually long time to collect your personal information, we may charge an additional amount. In each case, we will give You a full quote before photocopying the personal information. There is no charge for correcting personal

information.

We will assist You with your request and will respond as accurately and completely as reasonably possible. Where we refuse all or part of your request, we will give You the reasons for the refusal and the applicable legislation on which we base our refusal; the name and contact information of someone within CENTUM who can explain the basis for the refusal and of your right to apply to a Privacy Commissioner for review.

### **How We Protect Personal Information**

CENTUM makes reasonable efforts to ensure that Your personal information is protected against loss and unauthorized access, collection, use, disclosure, copying, modifying, disposal or similar risks. This protection applies in relation to personal information stored in both electronic and hard copy form and will vary depending on the sensitivity of the information.

Access to non-public personal information is restricted to selected employees or representatives on a need-to-know basis. In addition, CENTUM employs generally accepted information security techniques, such as firewalls and access control procedures in order to protect personal information against unauthorized access, collection, use, disclosure, copying, modifying, disposal or similar risk.

### **Retention of Personal Information**

CENTUM retains personal information for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws. Personal information which is collected and used to make a decision about You is retained for at least one year. Your consent to such purpose(s) remains valid after termination of CENTUM's relationship with You.

### **Changes to this Privacy Policy**

CENTUM reserves the right to modify this Privacy Policy at any time without notice. The Privacy Policy distributed at any time or from-time-to-time posted on the Website shall be deemed to be the Privacy Policy then in effect.

### **Accountability**

CENTUM is responsible for the personal information under its control, and we have designated a Privacy Officer who is responsible for our compliance with this Privacy Policy and with applicable laws. Other individuals within CENTUM may be delegated to act on behalf of the Privacy Officer and CENTUM will use appropriate means to provide a comparable level of protection while information is being processed by a third party.

You may contact our Privacy Officer as follows:

<b>CENTUM Financial Group Inc.</b>	
<b>Attention:</b>	Privacy Officer
<b>Address:</b>	700-1199 West Pender Street Vancouver, BC Canada V6E 2R1
<b>Phone:</b>	(604) 257-3940
<b>Fax:</b>	(604) 257-3949
<b>Email:</b>	<a href="mailto:privacy@centum.ca">privacy@centum.ca</a>

### **Dispute Resolution**

If You are unhappy about the collection, use or disclosure of your personal information by CENTUM, we ask that You discuss the matter further with our Privacy Officer.

If You are not satisfied with the response, You may make an application or complaint to the appropriate Privacy Commissioner.

### **Note to Brokers and Sales People**

In order to promote the services of our Franchisees and their brokers and sales people, CENTUM collects certain personal information about them, such as photographs and contact information, in a variety of ways, including through OnlineOffice registration. This information is disclosed by CENTUM when it makes the information available for Customers to access on the Website or through other means by which CENTUM promotes their services.

Much of this information is business contact information, which is not subject to privacy law or this Privacy Policy. However, to the extent that such information is personal in nature, CENTUM will collect, use and disclose this information in accordance with this Privacy Policy (see above) and, where applicable, with our Website Privacy Policy.

## **CENTUM FINANCIAL GROUP INC. WEBSITE PRIVACY POLICY**

The following addresses the personal information Centum Financial Group Inc. (“**CENTUM**”) may collect about You during any interaction with our website (the “**Website**”).

### **Your Acceptance of this Website Privacy Policy**

By using the Website, You signify your agreement with and acceptance of CENTUM’s Website Privacy Policy. If You do not accept this Website Privacy Policy, You must not access or use the Website.

CENTUM may, at any time, without notice or liability, revise this Website Privacy Policy by updating this posting. You should periodically revisit this posting to review any revisions to this Website Privacy Policy. If any revision is not acceptable to You, You must cease accessing and using the Website. If You continue to access or use the Website after any revisions are posted You will be deemed to have accepted those revisions.

### **Types of Personal Information**

We receive two types of personal information from Customers who visit the Website: (1) personal information that Customers provide through registration or other communication on the Website; and (2) personal information CENTUM gathers through aggregated tracking procedures, such as tallying the number of page views throughout the Website over a given period of time. The second type of personal information enables us to tailor the Website content to better meet the needs of our Customers. However, we assure You that CENTUM will not disclose your personal information to third parties except as is permitted by applicable law.

### **CENTUM and its Franchisees**

As a franchisor, CENTUM does not provide mortgage broker services. Mortgage broker services are provided exclusively by CENTUM franchisees (“**Franchisees**”). Each Franchisee is an independently owned and operated mortgage broker business. Customers applying for mortgage services through the Website apply through a Franchisee, not through CENTUM. While CENTUM has undertaken extensive measures to control and ensure the privacy and security of personal information obtained through the Website, it does not own or control the operations of its Franchisees. Customers who have concerns about the treatment of their personal information by a Franchisee with which they are dealing are urged to contact that Franchisee directly.

### **How Does CENTUM Collect Personal Information?**

- (a) **Registration:** CENTUM does not collect your personal information through the Website except when such personal information is provided to us on a voluntary basis. For example, CENTUM will collect a user’s name, address, phone number and/or e-mail address and any additional details that a user chooses to provide if he or she completes the portion of the Website that requests that CENTUM or one of the Franchisees contact

the user. If You choose not to provide your personal information please note that certain services associated with the Website may not be available to You as they cannot be supplied without your personal information. The personal information gathered through the Website is governed by the foregoing Privacy Policy.

(b) Usage tracking: \_

- (i) Use of IP Addresses: An IP address is a number that is automatically assigned to your computer whenever You are surfing the Internet. Web servers automatically identify your computer by its IP address.

CENTUM and/or its affiliates collect IP addresses for the purposes of system administration, to report aggregated information to our advertisers, and to audit the use of the Website. When Customers request pages from the Website, our servers log the requesting Customers' IP addresses. Except where You participate in any online transaction CENTUM may offer from time to time, we normally will not link IP addresses to anything personally identifiable, which means that Customers' sessions will be logged, but Customer identity remains anonymous to us. We can and will use IP addresses to identify a Customer when we feel it is necessary to enforce compliance with our rules or terms of service or to protect our service, the Website, or any person, or where it is otherwise permitted by law.

- (ii) Use Of Cookies: Cookies are bits of information that a website transfers to an individual's hard drive for record-keeping purposes. Cookies make Web surfing easier for You by saving your preferences while You visit the Website. We never save passwords or credit card information in cookies. The use of cookies is an industry standard, and, as such, You'll encounter them at most major websites.

By showing how and when Customers use the Website, cookies help us see which areas are popular and which are not. Many improvements and updates to the Website are based on data collected using cookies, such as the total number of visitors and pages viewed in a given period of time. This kind of information is most easily tracked using cookies.

CENTUM and/or its affiliates have two primary uses for its cookies. First, we use them to specify preferences. For example, Customers can specify keywords across several categories or markets so You do not have to tell us over and over again about the kinds of homes You are interested in obtaining information about. Secondly, we use cookies to track Customer trends and patterns. This helps us to better understand our Customers' needs and to improve areas of CENTUM and/or its Franchisees' services that our Customers may find valuable. Sometimes, information from cookies is attached to messages sent to our Customer Service department. While all of these situations depend on the use of a cookie, You always have the option of disabling the receipt of cookies on your computer by adjusting the cookies setting in your Web browser preferences.

Most browsers are initially set up to accept cookies. You can reset your Web browser to either refuse all cookies or indicate when a cookie is being sent, with a concurrent option to accept or receive the cookie. However, note that some of the services offered on the Website will not function properly or may be considerably slower if You refuse to receive cookies. For example, without cookies, You will not be able to set personalized preferences. You might also encounter difficulties participating in online transactions offered on the Website from time to time.

Occasionally, You may receive cookies from our advertisers. CENTUM and/or its affiliates do not control these cookies. The use of advertising cookies sent by third-party servers is standard in the Internet industry.

- (iii) Other: We automatically collect anonymous statistical information regarding usage of the Website. For instance, our Website will recognize the type of browser You are using (Netscape or Internet Explorer), the address of the Internet Service Provider you are using, the site that linked You to the Website, the pages You visit at the Website and similar information. None of this information identifies You personally.

### **With Whom Does CENTUM Share Your Personal Information?**

As a general rule, CENTUM will not disclose any of your personal information except when we have your permission or under special circumstances, such as when we believe in good faith that the law requires it or under other specified circumstances, including those described below:

- (a) Business Partners & Sponsors: CENTUM may disclose some or all your personal information to business partners or sponsors, but this use will be specifically described to You prior to either the collection or transfer of the personal information. Many promotions offer opportunities to request additional information from sponsors. By requesting more information, You give CENTUM permission to transfer your personal information to the sponsor so they can fulfill your request. In many instances, only your e-mail address will be shared with the sponsor. If we intend on sharing more personal information with the sponsor than your e-mail, You will be notified prior to the transfer.
- (b) Third Party Data and Data in the Aggregate: From time to time, on the Website You may be offered the opportunity to receive material or special offers from third parties. If You opt to receive information from these third parties, CENTUM will (with your permission) share your name and e-mail address with such third parties. Under confidentiality agreements, CENTUM may match Customer information with third party data. Also, CENTUM may disclose aggregated Customer statistics (i.e., where we disclose a characteristic of our Customers as a group and not as individuals) in order to describe our services to prospective partners, advertisers, and other third parties, and for other lawful purposes.
- (c) Service Providers: Information CENTUM receives through the Website is provided to service providers retained by CENTUM including Filogix Inc. and WhereToLive.com, Inc., in order to organize and distribute appropriate personal information to enable



CENTUM and its Franchisees to communicate with its Customers and to provide information about marketing initiatives that may be of interest to its Customers.

- (d) Other: CENTUM may disclose account information in special cases when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating CENTUM's Terms of Use or may be causing (either intentionally or unintentionally) injury to or interference with CENTUM's rights or property, other CENTUM Customers, or anyone else that could be harmed by such activities. CENTUM may disclose or access account information when we believe in good faith that the law requires it and for administrative and other purposes that we deem necessary to maintain, service, and improve our products and services. Note that to the extent that CENTUM retains a U.S. located service provider (including for example WhereToLive.com, Inc.) the personal information in that service provider's control or possession is subject to the laws of the jurisdiction in which it operates.

### **How Can You Control the Use of Your Personal Information?**

In case You change your mind or some personal information changes (such as your postal code or e-mail address), we will endeavour to provide a way to correct, update or remove the personal information You give us. Additionally, to keep You in control of the communications directed to You, we offer Customers the opportunity to "opt out" of having personal information shared with parties outside of CENTUM and/or its affiliated companies. If You wish, for any reason, to update your personal information or if You object to any use of your personal information described in this Website Privacy Policy, You may contact CENTUM's Privacy Officer:

CENTUM Privacy Officer  
700-1199 West Pender St.  
Vancouver, B.C.  
Canada V6E 2R1

Phone: (604) 257-3940  
Fax: (604) 257-3949  
Email: [privacy@centum.ca](mailto:privacy@centum.ca)

### **What happens when You link to a Third Party Website?**

You should be aware that when You are on the Website You could be directed to other third party websites that are beyond our control. There may, from time to time, be links to other third party websites from the Website that take You outside our service areas. For example, if You "click" on a banner advertisement on the Website, the "click" typically takes You off the Website. These other sites may include websites of advertisers, sponsors and partners that may use CENTUM's and/or its affiliates' and/or its Franchisees' logos as part of a co-branding agreement. These other websites may send their own cookies to Customers, or otherwise collect data or solicit information.

CENTUM and its affiliates and Franchisees do not control such third party websites, and, therefore, are not responsible for their content. The provision of hyperlinks to these websites does not imply any endorsement of the material on such websites or any association with their

operators. This Website Privacy Policy does not extend to anything that is inherent in the operation of the Internet and which is beyond the control of CENTUM, its affiliates or its Franchisees.

Please keep in mind that whenever You give out personal information online (for example, via message boards or chat lines), that personal information can be collected and used by people You do not know. While CENTUM and its affiliates strive to protect their Customers' personal information and privacy, we cannot guarantee the security of any personal information You disclose online and so You disclose such information at your own risk.

### **Is your Personal Information Secure from Others using the CENTUM Website?**

The importance of securing your personal information is of the utmost concern to us. We exercise great care in providing secure transmission of your information from your computer to our servers. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, CENTUM and its affiliates cannot promise or warrant the security of any personal information You transmit to us, including through the use of our online products or services. Any such transmission is done so at your own risk. Once we receive your transmission, CENTUM uses industry standard efforts to safeguard the confidentiality of your personal information, such as firewalls and Secure Socket Layers. However, ironclad security does not yet exist on the Internet.